LINDA LINGLE GOVERNOR OF HAWAII



MARIE C. LADERTA DIRECTOR

CINDY S. INOUYE

STATE OF HAWAII DEPARTMENT OF HUMAN RESOURCES DEVELOPMENT

235 S. BERETANIA STREET HONOLULU, HAWAII 96813-2437

August 28, 2008

To:

Division Chiefs

Branch Chiefs

From:

Marie Laderta

Director

Subject:

Plan to Protect and Redact Personal Information

Part VI of Act 10, First Special Session Laws of Hawaii 2008, provides in relevant part:

[A]II government agencies that collect, maintain, or disseminate documents containing personal information that are subject to disclosure pursuant to section 92F-12, Hawaii Revised Statutes, shall develop and implement a plan to protect and redact personal information, specifically social security numbers, contained in any existing hardcopy documents prior to making the documents available for public inspection.

It is the policy of the Department of Human Resources
Development that "personal information" shall be redacted (as set forth below)
from any document that is collected, maintained, or disseminated by the
Department of Human Resources Development before the document is made
available for public inspection (or otherwise produced pursuant to a chapter 92F
request.)

"'Personal information' means an individual's first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted:

- (1) Social security number;
- (2) Driver's license number or Hawaii identification card number; or

Plan to Protect and Redact Personal Information August 28, 2008 Page Two

(3) Account number, credit or debit card number, access code, or password that would permit access to an individual's financial account.

'Personal information' does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."

"Redaction" for the purposes of this memorandum means the complete removal from the document of the social security number, driver's license number or Hawaii identification card number, account number, credit or debit card number, access code, and/or password.

Prior to disclosure, all 92F responses must first be reviewed by either the Director or the Deputy Director prior to any production and redaction of documents for public inspection (or otherwise produced pursuant to a chapter 92F request).

If a Division Chief has any questions as to what information needs to be redacted, or in what manner the information needs to be redacted, or similar questions, the Division Chief shall consult with the Attorney General's Office while simultaneously notifying the Director or the Deputy Director before the document is made available for public inspection (or otherwise produced pursuant to a chapter 92F request.)

Attachment

PROCEDURES FOR SECTION 92F-12, HAWAII REVISED STATUTES REQUESTS

- All employees should be aware that all 92F-12 requests should first be routed to the Director's secretary.
- 2. The Director's secretary will route the request to:
 - a. Director
 - b. Deputy Director
 - c. Mitsue Kaneko
 - d. Mary Ann Teshima
 - e. Appropriate Division Manager
- 3. Upon receipt, Mitsue or Mary Ann will send a copy of the request to Jim Halvorsen, as necessary.
- Mitsue will be responsible for ensuring that deadlines are met. In the event that she is unavailable, then Mary Ann will assume the responsibility.
- 5. No responses should be sent out without approval from the Director's office.